Attachments

<703>

	ce Offerings including Voice Rate Data lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	522452	
<015>	Study Area Name	WHIDBEY TEL CO.	8
<020>	Program Year	2018	
<030>	Contact Name - Person USAC should contact regarding this data	Trish Mason	
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210013 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	trish.mason@whidbeytel.com	,
<701> <702>	Residential Local Service Charge Effective Date  1/1/2017  Single State-wide Residential Local Service Charge		

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	€
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge		Mandatory Extended Area Service Charge	Total per line Rates and Fee
WA	ALL		FR	18.0	0.0	0.0	0.0	18.0
AW	ALL		FR	18.0	0.0	0.0	0.0	18.0

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDREY TEL CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Trish Mason
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210013 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	trish.mason@whidbeytel.com

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State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees		Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
IA	South Whidbey	29.95	0.0	29.95	6.0	1.0	0.0	Other, No limit on usage allowance
IA.	South Whidbey	34.95	0.0	34.95	6.0	3.0	0.0	Other, No limit on usage allowance
A	South Whidbey	39.95	0.0	39.95	10.0	3.0	0.0	Other, No limit on usage allowance
A	South Whidbey	39.95	0.0	39.95	12.0	1.0	0.0	Other, No limit on usage allowance
A	South Whidbey	44.95	0.0	44.95	12.0	3.0	0.0	Other, No limit on usage allowance
A	South Whidbey	44.95	0.0	44.95	18.0	1.0	0.0	Other, No limit on usage allowance
A	South Whidbey	19.95	0.0	49.95	18.0	3.0	0.0	Other, No limit on usage allowance
A	South Whidbey	49.95	0.0	49.95	20.0	3.0	0.0	Other, No limit on usage allowance
Ą	South Whidbey	59.95	0.0	59.95	30.0	3.0	0.0	Other, No limit on usage allowance
Α.	South Whidbey	69.95	0.0	69.95	30.0	10.0	0.0	Other, No limit on usage allowance
A	South Whidbey	79.95	0.0	79.95	50.0	10.0	0.0	Other, No limit on usage allowance
A	South Whidbey	89.95	0.0	89.95	50.0	20.0	0.0	Other, No limit on usage allowance
Ą	Point Roberts	29.95	0.0	29.95	6.0	1.0	0.0	Other, No limit on usage allowance
A	Point Roberts	34.95	0.0	34.95	6.0	3.0	0.0	Other, No limit on usage allowance
A.	Point Roberts	39.95	0.0	39.95	10.0	3.0	0.0	Other, No limit on usage allowance
A	Point Roberts	39.95	0.0	39.95	12.0	1.0	0.0	Other, No limit on usage allowance
A	Point Roberts	44.95	0.0	44.95	12.0	3.0	0.0	Other, No limit on usage allowance
ł	Point Roberts	44.95	0.0	44.95	18.0	1.0	0.0	Other, No limit on usage allowance
j	Point Roberts	49.95	0.0	49.95	18.0	3.0	0.0	Other, No limit on usage allowance
	Point Roberts	49.95	0.0	49.95	20.0	3.0	0.0	Other, No limit on usage allowance
	Point Roberts	59.95	0.0	59.95	30.0	3.0	0.0	Other, No limit on usage allowance

(710)	<b>Broadband Price Offerings</b>	
Data	Collection Form	

<711>

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Trish Mason
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210013 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	trish.mason@whidbeytel.com

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	Exchange (ILEC)	Residential	State Regulated	Total Rates	Broadband Service -	Broadband Service	Usage Allowance	Usage Allowance
State	Excitatige (seec)	Rate	Fees	and Fees	Download Speed	-Upload Speed (Mbps)	(GB)	Action Taken
<b> </b>	Point Roberts				(Mbps)			When Limit Reached (select)
WA		69.95	0.0	69.95	30.0	10.0	0.0	Other, No limit on usage allowance
WA	Point Roberts	79.95	0.0	79.95	50.0	10.0	0.0	Other, No limit on usage allowance
WA	Point Roberts	89.95	0.0	89.95	50.0	20.0	0.0	Other, No limit on usage allowance
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			2					

(800) Operating Companies

Data Collection Form

			July 2013
<010>	Study Area Code	•	522452
<015>	Study Area Name		WHIDBEY TEL CO.
<020>	Program Year		2018
<030>	Contact Name - Person U	SAC should contact regarding this data	Trish Mason
<035>	Contact Telephone Numb	er - Number of person identified in data line <030>	3603210013 ext.
<039>	Contact Email Address - E	mail Address of person identified in data line <030>	trish.mason@whidbeytel.com
<810>	Reporting Carrier	Whidbey Telephone Company	
<811>	Holding Company	Whidbey Telephone Company	
<812>	Operating Company	Whidbey Telephone Company	

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

<a1></a1>	<a2></a2>	<33>
Affiliates	SAC	Doing Business As Company or Brand Designation
2012 George T.F. Henny Trust	522452	Whidbey Telephone Company
2012 George T.F. Henny Trust	522452	Whidbey Telecom
2012 George T.F. Henny Trust	522452	WhidbeyTV
2012 George T.F. Henny Trust	522452	Bayview Storage
2012 George T.F. Henny Trust	522452	Whidbey Telecom Internet & Broadband
2012 George T.F. Henny Trust	522452	WiFire
2012 Julia Henny DeMartini Trust	522452	Whidbey Telephone Company
2012 Julia Henny DeMartini Trust	522452	Whidbey Telecom
2012 Julia Henny DeMartini Trust	522452	WhidbeyTV
2012 Julia Henny DeMartini Trust	522452	Bayview Storage
2012 Julia Henny DeMartini Trust	522452	Whidbey Telecom Internet & Broadband
2012 Julia Henny DeMartini Trust	522452	WiFire
2012 Mark P. Henny Trust	522452	Whidbey Telephone Company
2012 Mark P. Henny Trust	522452	Whidbey Telecom
2012 Mark P. Henny Trust	522452	WhidbeyTV
2012 Mark P. Henny Trust	522452	Bayview Storage
2012 Mark P. Henny Trust	522452	Whidbey Telecom Internet & Broadband
2012 Mark P. Henny Trust	522452	WiFire
Western Long Distance, Inc.	522452	Western Long Distance
Western Long Distance, Inc.	522452	WhdibeyTelecom Long Distance
Western Long Distance, Inc.	522452	Point Roberts Long Distance
Western Long Distance, Inc.	522452	Hat Island Long Distance
Watercrest, Inc.	522452	Watercrest, Inc.

(800) Op	erating Companies			FCC Form 481
Data Col	lection Form			OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	•	522452	
<015>	Study Area Name		WHIDBEY TEL CO.	,
<020>	Program Year		2018	
<030>	Contact Name - Person L	JSAC should contact regarding this data	Trish Mason	
<035>	Contact Telephone Num	ber - Number of person identified in data line <030>	3603210013 ext.	
<039>	Contact Email Address -	Email Address of person identified in data line <030>	trish.mason@whidbeytel.com	
<810>	Reporting Carrier	Whidbey Telephone Company		
<811>	Holding Company	Whidbey Telephone Company		
<812>	Operating Company	Whidbey Telephone Company		

<a>&gt; <a>&gt; <a>&gt; <a>&gt; <a>&gt; <a>&gt; <a>&gt; <a>&gt;</a></a></a></a></a></a></a></a>	<a2></a2>	<83>
Affiliates	SAC	Doing Business As Company or Brand Designation
FiberCloud, Inc.	522452	FiberCloud
FiberCloud, Inc.	522452	Cloud City Hosting
American Alarm Systems, Inc.	522452	Whidbey Telecom Security and Alarms
Hat Island Telephone Company	522452	Hat Island Telephone Company
		•
	1	

# Whidbey Telephone Company FCC Form 481 (July, 2017), Line 510 Description of Processes and Procedures to Ensure Compliance with Service Quality Standards and Consumer Protection Rules Per Instructions For Completing FCC Form 481

This document details the processes and procedures that Whidbey Telephone Company (the "Company") follows to ensure compliance with service quality standards and consumer protections rules as set forth in the Instructions for Completing FCC Form 481.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time that the plant and facilities are constructed. Plant is augmented, upgraded and/or reconfigured as needed.

In addition, Company employees are periodically briefed on issues involving service quality standards and consumer protection rules. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues. An example of such an issue is the call completion problems that have arisen and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefor, deserves the attention of the Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If a complaint pertaining to the Company's compliance with service quality standards or consumer protection rules is received by the Company, the complaint is promptly investigated, the matter tracked and any corrective action noted. This process ensures that issues involved in the matter are addressed and corrections made, if needed.

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## Whidbey Telephone Company FCC Form 481 (July, 2017), Line 610 Statement Describing Ability to Function in Emergency Situations Per Instructions for Completing FCC Form 481

### **SUMMARY**

Whidbey Telephone Company (the "Company") has a long-standing tradition of providing reliable voice telephony services. Since 1961, it has been and continues to be the Company's policy to bury all local distribution cable and wire. It is also the Company's policy and standard operating procedure to install, and use when necessary, back-up power systems at all network node installation sites. In regard to the Company's overall network design, the Company's practices are consistent with Rural Utility Service ("RUS") telecommunications industry best practices.

The Company operates and maintains transport transmission equipment of only the highest grade. Equipment specifications, which are consistent with the RUS specifications, require both redundant power and redundant circuit interfaces. All of the Company's transport and switching equipment is monitored 7x24x365(366) by trained staff located at the Company's network operations center.

### NETWORK REDUNDANCY

The Company is a provider of voice telephony services to two geographically non-contiguous exchanges: the South Whidbey Exchange and the Point Roberts Exchange. The area of the Company's South Whidbey Exchange service area is more than 67 square miles, and the Company's Point Roberts Exchange service area includes approximately 6 square miles.

The Company has two central offices ("COs"; each a "CO"):, South Whidbey and Point Roberts. The switch equipment is supported by the manufacturer. The Point Roberts CO is connected to the Company's South Whidbey CO via multiple diversely routed redundant facilities and is configured to maintain limited service including local emergency services in the event of a facility failure to the South Whidbey CO. The primary paths consist of a diversely routed optical fiber ring utilizing Synchronous Optical Network ("SONET") technology. In addition, the Company operates a microwave transmission path between South Whidbey and Point Roberts, providing multiple DS-3s capacity which offers additional back-up capability.

The Company's voice telephony network has diversely routed paths to multiple points of interconnection with the networks of other voice telephony carriers. The Company also operates an Ethernet optical ring that connects its South Whidbey network with collocation facilities utilized by the Company outside its service area. The combination of the optical ring architecture and the DWDM capability of the Company's core transport equipment provides a highly reliable circuit network for voice telephony communications with substantial opportunity for augmentation, if demand volumes were to so require.

522452wa610.pdf

The Company's presence in collocation facilities allows for multiple points of interconnection with both local and regional carriers, giving the Company the flexibility to route traffic to multiple carriers. During service impairment created by physical damage or extraordinarily high traffic, the Company has the capability to reroute voice telephony traffic through any of those collocation facilities.

The network architecture within the Company's South Whidbey service area is comprised of a host CO and a number of core aggregation points, or Optical Remote Sites ("ORSs"). All of the ORS locations are connected by a physically diverse optical DWDM ring, with any of those locations being capable of maintaining service in the event of a failure of that physical fiber cable.

Connectivity to the end-user customer base is accomplished by the placement of a number of Broadband Loop Carrier remote terminals ("BLCs") that subtend the ORSs or host CO. Each of these BLCs has optical diversity between the main CO and serving ORS. Some of the BLCs also have physical route diversity connected to the CO or ORS that they subtend.

The Company's employees are trained to operate, maintain and/or repair the Company's network facilities. Qualified Company personnel are available for call-out 24x7x365(366) in the event of a service outage. The Company maintains an inventory of critical spare electronic/optronic cards, as well as cabinets, cable and other related materials necessary for restoration on site at both South Whidbey and Point Roberts.

### **BACK-UP POWER**

The Company maintains a power plant at each CO, ORS, BLC and microwave site with batteries capable of carrying the power load for several hours with the load typically transitioning more immediately to a generator back-up power generation. For BLC sites without local generators, portable generators are deployed as needed.

In addition, the Company has installed back-up power generation at its COs, as well as at each of its ORSs and microwave installations. These generators range in size from 750kw to 5kw. Each generator has a dedicated fuel tank onsite designed to carry the power load for multiple days. All of these sites are equipped with automatic transfer switches and have monitoring equipment that provides monitoring visibility with respect to loss of external commercial power and transfer switch status. Upon recognition of loss of the commercial power source, the relevant automatic transfer switch is designed to automatically start the back-up generator and transfer the selected power source. Alarm messages are automatically reported to key personnel, as well as to the Company's 7x24x365(366) network operations center.

The Company has in-house staff trained to perform all maintenance of the power plant and has contract services available for support. Power distribution equipment within the Company's COs is inspected from time to time by vendor representatives to ensure proper maintenance. It is the Company's policy that all power plant maintenance be recorded and stored for future reference.

522452wa610.pdf

FCC FORM 481 (July 2017), Line 1010
Descriptive Document for Compliance of Pricing of
Fixed Voice Services with Required Relationship
To Applicable National Average Urban Rate for Voice
Service Benchmark, as required by 47 C.F.R. § 54.313(a)(10)
Per Instructions for Completing FCC Form 481

Section 54.313(a)(10) of the rules of the Federal Communications Commission ("FCC") requires any recipient of high-cost support, such as Whidbey Telephone Company ("Company"), annually to certify that the pricing of the Company's voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 17-167, released February 14, 2017, in WC Docket No. 10-90 ("Public Notice"). That public notice includes the following statements, "Based on the survey results, the 2016 rate floor for voice services is \$22.49, [footnote omitted] and the reasonable comparability benchmark for voice services is \$49.51. [footnote omitted] . . . . In addition, each ETC, including competitive ETCs providing fixed voice services, [footnote omitted] must certify in the FCC Form 481 filed no later than July 1, 2017, that the pricing for its *basic residential voice* services is no more than \$49.51. [footnote omitted]" [Italics added.]

It is the Company's understanding that the above-mentioned comparability benchmark includes the recurring residential service rate, any applicable State subscriber line charge rate, any applicable State universal service fund rate, any applicable minimum mandatory Extended Area Service rate, and any applicable Federal subscriber line charge rate.<sup>1</sup>

Those components for the Company's basic residential voice telephony service as of June 1, 2017, are as follows:

Recurring residential service rate		\$ 18.00
State subscriber line charge rate		0.00
State universal service fund rate		0.00
Minimum mandatory EAS rate		0.00
Federal subscriber line charge		6.50
	Total	\$ 24.50

<sup>&</sup>lt;sup>1</sup> See Note 5 on the "Data Dictionary" tab of 2016 Results [2016 URS Voice Data.xlsx] located from the FCC webpage having the following URL:

https://www.fcc.gov/general/urban-rate-survey-data-resources

The sum of the above-identified rates (\$24.50) is not more than the voice service comparability benchmark identified in the Public Notice (\$49.51).

# FCC FORM 481 (July 2017), Line 1030 Descriptive Document for Compliance of Pricing of Broadband Services with Required Relationship To Applicable National Average Urban Rate for Broadband Service Benchmark, as required by 47 C.F.R. § 54.313(a)(12) Per Instructions for Completing FCC Form 481

Section 54.313(a)(12) of the rules of the Federal Communications Commission ("FCC") requires any recipient of high-cost support, such as Whidbey Telephone Company ("Company"), annually to certify that the pricing of a service that meets the Commission's broadband public interest obligations is no more than the applicable benchmark to be announced annually in a public notice issued by the Wireline Competition Bureau, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 17-167, released February 14, 2017 in WC Docket No. 10-90 ("Public Notice"). That public notice includes the following: "Under the approach adopted by the Bureau in 2014, the reasonable comparability broadband benchmark varies, depending upon the supported service's download and upload bandwidths and usage allowance. [footnote omitted]"

The Public Notice includes a table showing the "benchmark" rate for certain broadband service offerings and provides a URL link to an FCC webpage at which a tool to calculate "benchmarks" for other broadband service offerings may be found. The following table summarizes the broadband service plans offered to consumers by the Company and the associated "benchmark," as determined from the Public Notice or the "tool" to which it refers:

Download Speed (Mbps) (up to)	Upload Speed (Mbps) (up to)	Usage Allowance (GB)	Benchmark	Company Pricing
10	3	Unlimited	\$78.47	\$39.95
20	3	Unlimited	\$87.60	\$49.95
30	3	Unlimited	\$92.93	\$59.95
30	10	Unlimited	\$93.49	\$69.95
50	10	Unlimited	\$100.20	\$79.95
50	20	Unlimited	\$100.52	\$89.95

As shown in the above table, each of the broadband service plans offered to consumers by the Company, for which "benchmark" rates are available, is offered at a price that is below the applicable "benchmark."



June 26, 2017

Ms. Marlene H. Dortch, Secretary Federal Communication Commission Office of the Secretary 455 12<sup>th</sup> Street, SW Washington, DC 20554

RE.

WC Docket No. 10-90 and 14-58 –

Annual Report Due July 1, 2015, FCC Form 481 for Rate of Return Carriers Receiving High-Cost Support – 47 C.F.R. § 54.313(f)(1)(i) "Public Interest Certification"

Dear Ms. Dortch:

In compliance with the filing requirements associated with FCC Form 481 due July 1, 2017, and in compliance with Section 53.313(f)(1)(i) of the Commission's rules, Whidbey Telephone Company (Study Area 522452) hereby certifies that it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time.

Sincerely,

WHIDBEY TELEPHONE COMPANY

у \_\_\_\_\_

Controller



1501 Regents Blvd., Suite 100 Firerest, WA 98-i66-6060

April 26, 2017

Board of Directors and Management of Whidbey Telephone Company and Subsidiaries Langley, Washington

To Management and the Board of Directors:

We have audited the consolidated financial statements of Whidbey Telephone Company and Subsidiaries (the "Company") as of December 31, 2016, and have issued our report thereon dated April 26, 2017. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our letter to you dated December 16, 2016. Professional standards also require that we communicate to you the following information related to our audit.

## Significant Audit Findings

**Oualitative Aspects of Accounting Practices** 

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by Whidbey Telephone Company and Subsidiaries are described in Note 1 to the consolidated financial statements. No new accounting policies were adopted, and the application of existing policies was not changed during 2016. We noted no transactions entered into by the Company during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the consolidated financial statements in the proper period.

Accounting estimates are an integral part of the consolidated financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the consolidated financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting these consolidated financial statements include management's estimate of the useful lives of property, plant and equipment, recoverability of long-term assets, fair value of financial instruments and investments, collectability of related party receivables and interstate revenue requirements all of which are based on prior experience with similar assets, liabilities and interstate filing requirements. Also included is management's estimate of the future maturities of long-term debt which are based on minimum required payments at current levels of debt.

We evaluated these estimates and determined that they are reasonable in relation to the financial statements taken as a whole.

Certain consolidated financial statement disclosures are particularly sensitive because of their significance to the financial statement users. The most sensitive disclosures affecting the consolidated financial statements were regarding investments (Note 4), property, plant and equipment (Note 5), notes payable and long-term debt (Note 6), discontinued operations (Note 8), leases and service agreements (Note 9) and various related party transactions (Notes 4 and 11).

The consolidated financial statement disclosures are neutral, consistent and clear.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

## Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. Management has corrected all such misstatements. In addition, none of the misstatements detected as a result of audit procedures and corrected by management were material, either individually or in the aggregate, to the consolidated financial statements taken as a whole.

Disagreements with Management

For purposes of this letter, a disagreement with management is a financial accounting, reporting or auditing matter, whether or not resolved to our satisfaction that could be significant to the consolidated financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated April 26, 2017.

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Company's consolidated financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Company's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

### Other Matters

With respect to the supplementary information accompanying the consolidated financial statements, we made certain inquiries of management and evaluated the form, content and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United States of America, the method of preparing it has not changed from the prior period and the information is appropriate and complete in relation to our

audit of the consolidated financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the consolidated financial statements or to the consolidated financial statements themselves.

This information is intended solely for the use of management and the board of directors of Whidbey Telephone Company and Subsidiaries and is not intended to be, and should not be, used by anyone other than these specified parties.

Very truly yours, Johnson, Stone & Pages, P.S.

JOHNSON, STONE & PAGANO, P.S.

(3005a) Operating Report for Privately-Held Rate of Return Carriers				orm 481			
Balance Sheet - Data Collection Form				Control No. 3060-0986			
Page 1 of 3			July 20	013			
				OF A STATE OF THE PROTECTION AND THE STATE OF THE STATE O			
<010> Study Area Code			<0100		522452		
<015> Study Area Name				Whidbey Telephone Company			
<020> Program Year			<020>		2018		
<030> Contact Name - Person USAC should contact regarding this data				Trish Mason			
<035> Contact Telephone Number - Number of person identified in da				360-321-0013			
<039> Contact Telephone Email Address - Email Address of person ide	ntified in data lin	ie <030>	<039>	trlsh.mason@whidbeytel.com			
Files as reviewed single company				♂ Filed as audited single company			
Filed as reviewed consolidated company				Filed as audited consolidated company			
Filed as subsidiary of reviewed consolidated				Filed as subsidiary of audited consolidated of			
rifed as subsidiary of reviewed consolidated	Company	CERTIFIC	OLTA		ompany		
We hereby certify that the entries in this report are in accordance with t	he accounts and				nur knowlan	lae and helief	
7/70.	ine decounity unio	/ /	, , , , ,	em uno repeat the status of the system to the best of t	or knowled	ge and bellej.	
Affi		1/14/17					
Signature	an agent a seems that it is not the con-	Date					
) spirature		PART A. BAL	ANCES	SHEET			<u> </u>
· · · · · · · · · · · · · · · · · · ·	BALANCE	BALANCE END		AILL!	—т	BALANCE	BALANCE END
ASSETS	PRIOR YEAR	OF PERIOD		LIABILTIES AND STOCKHOLDERS' EQUITY	- 1	PRIOR YEAR	I
CURRENT ASSETS	, mon team		CHER	ENT LIABILITIES		RIOR TEAR	OF PERIOD
Cash and Equivalents			25.	Accounts Payable			
Cash-RUS Construction Fund			26.	Notes Payable			
3. Affiliates:			27.	Advance Billings and Payments			
a. Telecom, Accounts Receivable			28.				
b. Other Accounts Receivable			29.	Customer Deposits Current Mat. L/T Debt			
c. Notes Receivable			30.				
4. Non-Affiliates:			31.	Current Mat. L/T Debt-Rur. Dev.			
a. Telecom, Accounts Receivable			32.	Current MatCapital Leases Income Taxes Accrued			
			33.				
b. Other Accounts Receivable				Other Taxes Accrued			
c. Notes Receivable			34.	Other Current Liabilities			
5. Interest and Dividends Receivable			35.	Total Current Liabilities (25 thru 34)			
6. Material-Regulated				-TERM DEBT			
7. Material-Nonregulated			36.	Funded Debt-RUS Notes			
8. Prepayments			37.	Funded Debt-RTB Notes			
9. Other Current Assets			38.	Funded Debt-FFB Notes			
10. Total Current Assets (1 Thru 9)			39.	Funded Debt-Other			
NOAICH DOTAIT ACCTTC			40.	Funded Debt-Rural Develop, Loan			
NONCURRENT ASSETS			41.	Premium (Discount) on L/T Debt			
11. Investment in Affiliated Companies			42.	Reacquired Debt			
a. Rural Development			43.	Obligations Under Capital Lease			
b. Nonrural Development			44.	Adv. From Affiliated Companies			
12. Other Investments			45.	Other Long-Term Debt			
a. Rural Development			46.	Total Long-Term Debt (36 thru 45)			
b. Nonrural Development				R LIAB. & DEF. CREDITS			
13. Nonregulated Investments			47.	Other Long-Term Liabilities			
14. Other Noncurrent Assets			48.	Other Deferred Credits			
15. Deferred Charges			49.	Other Jurisdictional Differences			
16. Jurisdictional Differences			50.	Total Other Liabilities and Deferred Credits (47 thru	49)		
17. Total Noncurrent Assets (11 thru 16)			EQUIT				
			51.	Cap. Stock Outstanding & Subscribed			
PLANT, PROPERTY, AND EQUIPMENT			52.	Additional Paid-in-Capital			
18. Telecom, Plant-in-Service			53.	Treasury Stock			
19. Property Held for Future Use			54.	Membership and Cap. Certificates			
20. Plant Under Construction			55.	Other Capital			
21. Plant Adj., Nonop. Plant & Goodwill			56.	Patronage Capital Credits			
22. Less Accumulated Depreciation			57.	Retained Earnings or Margins			
23. Net Plant (18 thru 21 less 22)			58.	Total Equity (51 thru 57)			
24. TOTAL ASSETS (10+17+23)			59.	TOTAL LIABILITIES AND EQUITY (35+46+50+58)			

(3005b) Operating Report for Privately-Held Rate of Return Carriers FCC Form 481 Balance Sheet - Data Collection Form OM8 Control No. 3060-0986 Page 2 of 3 July 2013 <010> Study Area Code <010> 522452 <015> Study Area Name <015> Whidbey Telephone Company <020> Program Year <020> 2018 <030> Contact Name - Person USAC should contact regarding this data <030> Trish Mason <035> Contact Telephone Number - Number of person identified in data line <030> <035> 360-321-0013 <039> Contact Telephone Email Address - Email Address of person identified in data line <030> <039> trish.mason@whidbeytel.com

	PART B. STATEMENTS OF INCOME AND RETAINED EARINGS OR MARGINS	·	
	ITEM	PRIOR YEAR	THIS YEAR
1.	Local Network Services Revenues		
2.	Network Access Services Revenues		
3.	Long Distance Network Services Revenues		
4.	Carrier Billing and Collection Revenues		
5.	Miscellaneous Revenues		
6.	Uncollectible Revenues		
7.	Net Operating Revenues (1 thru 5 less 6)		
8.	Plant Specific Operations Expense		
9.	Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10.	Depreciation Expense		
11.	Amortization Expense		
12.	Customer Operations Expense		
13.	Corporate Operations Expense		
4.	Total Operating Expenses (8 thru 13)		
5.	Operating Income or Margins (7 less 14)		
6.	Other Operating Income and Expenses		
7.	State and Local Taxes		
8.	Federal Income Taxes		
9.	Other Taxes		
0.	Total Operating Taxes (17+18+19)		
11.	Net Operating Income or Margins (15+16-20)		
2.	Interest on Funded Debt		
3.	Interest Expense - Capital Leases		
4.	Other Interest Expense		
5.	Allowance for Funds Used During Construction		
26.			
27.	Total Fixed Charges (22+23+24-25)  Nonoperating Net Income		
8.	Extraordinary Items		
9.	Jurisdictional Differences		
0.	Nonregulated Net Income		
1.	Total Net Income or margins (21+27+28+29+30-26)		
2.	Total Taxes Based on Income		
3.	Retained Earnings or Margins Beginning-of-Year		
4.	Miscellaneous Credits Year-to-Date		
5.	Dividends Declared (Common)		
6.	Dividends Declared (Preferred)		
7.	Other Debits Year-to-Date		
3.	Transfers to Patronage Capital		
9.	Retained Earnings or Margins end-of-Period [(31+33+34)-(35+36+37+38)]		
0.	Patronage Capital Beginning-of-Year		
1.	Transfers to Patronage Capital		
2.	Patronage Capital Credits Retired		
3.	Patronage Capital End-of-Year (40+41-42)		
4.	Annual Debt Service Payments		
S.	Cash Ratio [{14+20-10-11}/7]		
6.	Operating Accrual Ratio [{14+20+26)/7}		
7.	TIER [{31+26}/26]	10 to	

(3005c)	Operating Report for Privately-Held Rate of Return Carriers		FCC For	m 481
Balance	Sheet - Data Collection Form		OMB Co	ontrol No. 3060-0986
Page 3 o	of 3		July 201	3
<010>	Study Area Code	ž.	<010>	522452
<015>	Study Area Name		<015>	Whidbey Telephone Company
<020>	Program Year		<020>	2018
<030>	Contact Name - Person USAC should contact regarding this data		<030>	Trish Mason
<035>	Contact Telephone Number - Number of person identified in data	line <030>	<035>	360-321-0013
<039>	Contact Telephone Email Address - Email Address of person identif	ified in data line <030>	<039>	trish.mason@whidbeytel.com

PART C. STATEMENTS OF CASH FLOWS	
Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	
CASH FLOWS FROM OPERATING ACTIVITIES	
2. Net Income	
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3. Add: Depreciation	
4. Add: Amortization	
5. Other (Explain)	
Changes in Operating Assets and Liabilities	
6. Decrease/(Increase) in Accounts Receivable	
7. Decrease/(Increase) in Materials and Inventory	
8. Decrease/(Increase) in Prepayments and Deferred Charges	
9. Decrease/(Increase) in Other Current Assets	
10. Increase/(Decrease) in Accounts Payable	
11. Increase/(Decrease) in Advance Billings & Payments	
12. Increase/(Decrease) in Other Current Liabilities	
13. Net Cash Provided/(Used) by Operations	
CASH FLOWS FROM FINANCING ACTIVITIES	
14. Decrease/(Increase) in Notes Receivable	
15. Increase/(Decrease) in Notes Payable	F-MERICAL STATE
16. Increase/(Decrease) in Customer Deposits	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits	
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	
20. Less: Payment of Dividends	
21. Less: Patronage Capital Credits Retired	
22. Other (Explain)	
23. Net Cash Provided/(Used) by Financing Activities	
CASH FLOWS FROM INVESTING ACTIVITIES	
24. Net Capital Expenditures (Property, Plant & Equipment)	
25. Other Long-Term Investments	
26. Other Noncurrent Assets & Jurisdictional Differences	
27. Other (Explain)	
28. Net Cash Provided/(Used) by Investing Activities	
29. Net Increase/(Decrease) in Cash	
30. Ending Cash	